COMMONWEALTH OF VIRGINIA
Department of Environmental Quality
Valley Regional Office

STATEMENT OF LEGAL AND FACTUAL BASIS

Lear Corporation - Strasburg
Strasburg, Virginia
Permit No. VRO80964

Title V of the 1990 Clean Air Act Amendments required each state to develop a permit program to ensure that certain facilities have federal Air Pollution Operating Permits, called Title V Operating Permits. As required by 40 CFR Part 70 and 9 VAC 5 Chapter 80, Lear Corporation - Strasburg has applied for a Title V Operating Permit for its plastic automotive interior trim component manufacturing facility. The Department has reviewed the application and has prepared a draft Title V Operating Permit.

Engineer/Permit Contact:_____ Date:_____

Air Permit Manager:_____ Date:_____

Regional Permit Manager:_____ Date:_____

FACILITY INFORMATION

Permittee
Lear Corporation - Strasburg
P. O. Box 181
Strasburg, Virginia 22657

Facility
Lear Corporation Strasburg
East Queen Street
Strasburg, Virginia 22657

NET Identification Number: 51-171-0058

SOURCE DESCRIPTION

SIC 3089 – Plastics Products, Not Elsewhere Classified

Lear Corporation is involved in the manufacturing of plastic automotive interior trim components. Manufacturing processes include: painting, injection molding, foam production, adhesive application, and rotocast machines.

The facility is a Title V major source of VOC, CO, and HAPs. This source is located in an attainment area for all pollutants, and is currently a PSD synthetic minor source. The facility was previously permitted under minor new source review permits issued on May 13, 1977; October 20, 1986; February 19, 1998; January 30, 2001; and, May 3, 2001.

COMPLIANCE STATUS

The facility is inspected once a year. Lear was last inspected on August 24, 1999, and is now operating in compliance.

EMISSION UNIT AND CONTROL DEVICE IDENTIFICATION

The emissions units at this facility consist of the following :

Table I. Significant Emission Units.

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
Plant 1							
PL1-PAINT F	1-4 1-6	Two Painting Spray Booths, Each Equipped with a 0.16 mmBTU/hr Drying Oven	5 gal/hr	Water Curtain Or Dispo Cloth Filter	PL1-WC2	PM PM-10	10/20/1986
				Sunkiss Thermoreactor	PL1-PTF-CAT	VOC	
INC-1	1-8	Smoketroll Incinerator	1000 lb/hr	-	-	-	5/13/1977
PL1-MAINT	1-13	Binks Sames Series 2100 Industrial Floor Spray Booth	10 gal/week	AF Paper Filter	PL1-MAINT-FILT	PM PM-10	6/5/1998
PL1-PBP90	1-90	ITW Binks Paint Spray Booth With Four HVLP Spray Guns	6.4 gal/hr	Dry Filters	Pl1-PBP90-FILT	PM PM-10	5/3/2001
Plant 2							
PL2-PAINT	2-1	Paint Line equipped with Two (2) HVLP guns and a Drying Oven	5 gal/hr	Water Curtain Or Dispo Cloth Filter	PL2-WC1	PM PM-10	-
HCO	2-11	Armature Coil Equipment, Inc. Heat Cleaning Oven Model 260-RKG	60 lbs/hr (dried paint)	Direct Flame Afterburner	PL2-AB	PM PM-10	2/19/1998
PL2-GB1-Line 1	2-15	Water-based Gluing Line 1 HVLP guns [part of GMX130 manufacturing process]	252 parts/hr	AF Paper Filter	PL2-GLUE-FILT	PM PM-10	6/5/1998
				Infrared Oven	PL2-LINE1-CAT	VOC	

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
PL2-GB2-Line 1	2-16	Water-based Gluing Line 1 HVLP guns [part of GMX130 manufacturing process]	252 parts/hr	AF Paper Filter	PL2-GLUE-FILT	PM PM-10	6/5/1998
				Infrared Oven	PL2-LINE1-CAT	VOC	
PL2-GB1-Line 2	2-17	Water-based Gluing Line 2 HVLP guns [part of GMX130 manufacturing process]	252 parts/hr	AF Paper Filter	PL2-GLUE-FILT	PM PM-10	6/5/1998
				Infrared Oven	PL2-LINE2-CAT	VOC	
PL2-GB2-Line 2	2-18	Water-based Gluing Line 2 HVLP guns [part of GMX130 manufacturing process]	252 parts/hr	AF Paper Filter	PL2-GLUE-FILT	PM PM-10	6/5/1998
				Infrared Oven	PL2-LINE2-CAT	VOC	
Plant 4							
PL4-TCH-UP	4-5	Touch-Up Paint Booth	0.88 oz/hr	AF Paper Filter	PL4-TCH-UP-FILT	PM PM-10	-
Miscellaneous							
SK1	-	Degreaser utilizing Safety Kleen	-	-	-	-	-
MOLD-CLN	-	Mold Cleaning	-	-	-	-	-
Paint-CLN	-	Safety Kleen Paint Line Cleaners	-	-	-	-	-

EMISSIONS INVENTORY

A copy of the 1999 annual emission update is attached as Attachment A. Emissions are summarized in the following tables.

Table II. 1999 Actual Criteria Pollutant Emissions.

	Criteria Pollutant Emissions (tons/yr)				
	VOC	CO	SO_2	PM-10	NO_x
Plant 1	12.30	1.02	0.01	0.19	0.07
Plant 2	26.50	0.06	0.00	0.20	0.30
Plant 3*	4.40	-	-	-	-
Plant 4	0.02	-	-	-	-
Miscellaneous	20.10	-	-	-	-
Total	**63.32**	**1.08**	**0.01**	**0.39**	**0.37**

*Note: PL3-PAINT (the only significant activity in Plant 3) was removed from the facility in 2001.

Table III. 1999 Actual Hazardous Air Pollutant Emissions.

Pollutant	Hazardous Air Pollutant Emissions (tons/yr)*
Bis(2-ethylhexyl)phthalate (CAS # 117-81-7)	-
Glycol Ethers	-
Methanol (CAS # 67-56-1)	-
Methyl Ethyl Ketone (CAS # 78-93-3)	-
Methyl Isobutyl Ketone (CAS # 108-10-1)	-
Methylene Chloride (CAS # 74-87-3)	-
Methylenediphenyl Diisocyanate (CAS # 101-68-8)	-
Toluene (CAS # 108-88-3)	-
Trichloroethylene (CAS # 79-01-6)	-
Xylene (CAS # 1330-20-7)	-

*Note: Emission rates for HAPs are included in the emission rate of the criteria pollutants (as seen in Table II). Specific emission rates for each individual HAP have not been calculated.

EMISSION UNIT APPLICABLE REQUIREMENTS

Plant 1 Requirements

Limitations

PL1-PAINT F [two paint spray booths]

The following limitations are state BACT requirements from the minor new source review permit issued on October 20, 1986. Please note that the condition numbers are from the 1986 permit; a copy of the permit is enclosed as Attachment B.

Condition 4 (Part I): Limits hours of operation of the paint spray booths to 6,240 hours per year.

Condition 5 (Part I): Limits VOC emissions from the paint spray booths to 9.23 tons per year and average hourly emissions to 2.95 pounds per hour.

Condition 5 (Part II): Requires that all operators of air pollution control equipment be properly trained.

Condition 6 (Part II): Requires operating procedures be maintained for all air pollution control equipment.

The paint spray booths are subject to 9 VAC 5-50-80, Standard for Visible Emissions, which requires visible emissions to be less than 20% except during one six minute period in any one hour in which visible emissions can not exceed 30%.

A requirement to operate filters or a water curtain on the paint spray booths has been included to ensure compliance with the visible emission standard.

INC-1 [incinerator]

The incinerator is operating under a minor new source review permit dated May 13, 1977. The only applicable requirement in that permit states that the approved fuel for the incinerator is #2 fuel oil. This requirement has been incorporated into the Title V permit. A copy of the May 13, 1977 permit is enclosed as Attachment C.

The incinerator is subject to 9 VAC 5 Chapter 40, Part II, Article 7 (Emissions Standards for Incinerators). This regulation (9 VAC 5-40-750) limits particulate emissions to 0.14 gr/dscf. This limit has been incorporated into the Title V permit. Also, a requirement to operate an afterburner on the incinerator has been incorporated to ensure compliance with the particulate limit.

The incinerator is subject to 9 VAC 5-50-80, Standard for Visible Emissions, which requires visible emissions to be less than 20% except during one six minute period in any one hour in which visible emissions can not exceed 30%.

PL1-MAINT [paint spray booth]

The following limitations are state BACT requirements from the minor new source review permit issued on June 5, 1998. Please note that the condition numbers are from the 1998 permit; a copy of the permit is enclosed as Attachment D.

Condition 8: Limits VOC emissions from the maintenance spray booth to 1.3 tons per year.

Condition 9: Limits visible emissions from the maintenance spray booth stack to 5%.

A requirement to operate filters on the maintenance spray booths has been included to ensure compliance with the visible emission standard.

PL1-PBP90 [paint spray booth]

The following limitations are state BACT requirements from the minor new source permit issued on May 3, 2001. Please note that the condition numbers are from the 2001 permit; a copy of the permit is enclosed as Attachment E.

Condition 3: Requires that particulate emissions from the spray booth be controlled by dry filters.

Condition 4: Requires that VOC emissions from the spray booth be minimized through the use of HVLP guns.

Condition 5: Limits VOC emissions from the spray booth to 3.0 lb VOC/gal (less water and exempt solvents).

Condition 8: Limits coating throughput to the spray booth to 20,000 gallons per year. The minor new source review permit references a specific brand of coatings. The brand referenced no longer exists, due to a corporate buyout, and a permit amendment is currently in process that simply limits decorative coating throughput to 20,000 gallons per year.

Condition 9: Limits VOC emissions from the spray booth to 15.3 tons per year.

Condition 11: Limits visible emissions from the spray booth to 5% opacity.

Condition 16: Requires maintenance of all scheduled and unscheduled maintenance on process and air pollution control equipment. Requires that Lear maintain an inventory of spare parts.

Monitoring

PL1-PAINT F

Lear will be required to perform daily inspections of the paint spray booth filter(s) each day the paint spray booths are in operation. The daily inspections will reveal potential problems with the filter(s), thereby allowing the problems to be identified prior to operation of the paint spray booth(s). If the filter(s) are not functioning properly, visible emissions will be present.

Lear is required to maintain certified MSDS showing VOC content for each coating used in the spray booths. The MSDS sheets that Lear obtains from their vendor includes the VOC content, derived by Method 24 for solvent based coatings and calculated for water based coatings. It should be noted that their vendor believes Method 24 to provide inconsistent results when testing water borne coatings and that EPA is currently in the process of revising Method 24 as it applies to water borne coatings. Therefore, the vendor has opted to certify to the VOC content based on material balance-type methods. These MSDS will be utilized in calculating VOC emissions as detailed below.

Lear will demonstrate compliance with the VOC emission limits using the VOC content in the certified MSDS in mass balance calculations. The VOC content has been certified by the vendor, thereby providing reasonable assurance that the VOC emission limits are not violated.

Lear will determine compliance with the VOC emission limits for the paint spray booths using the following formulas:

- To determine annual emissions of VOC from coating usage:

$$E = \sum_{i=1}^{n} C_i G_i$$

.... Equation 1

Where:

E = VOC emission rate of the paint coating line [Unit PL1-PAINT F] (lb/time period)

C_i = VOC content of each material [including coatings, thinners, and cleaning solvents] (i) applied in the paint coating line [Unit PL1-PAINT F] during the time period (lb/gal)

G_i = Number of gallons of each material [including coatings, thinners, and cleaning solvents] (i) applied in the paint coating line [Unit PL1-PAINT F] during each month (gal)

Annual emissions shall be calculated as the sum of each consecutive 12 month period.

- To calculate average hourly emission rates:

$$PE = \frac{E}{H}$$

.... Equation 2

Where:

PE = average hourly VOC emission rate of the paint coating line [Unit PL1-PAINT F] (lb/hour)

E = VOC emission rate of the paint coating line [Unit PL1-PAINT F] (lb/month)

H = hours of operation of the paint coating line [Unit PL1-PAINT F] (hr/month)

Average hourly VOC emissions shall be calculated once each month.

The daily inspections, monitoring, and recordkeeping required by the permit will satisfy the periodic monitoring requirements for the paint spray booths.

INC-1

Opacity has been chosen as a surrogate for particulate matter emissions. The permittee will perform weekly inspections of the incinerator stack to determine the presence of visible emissions. If during the inspection, visible emissions are observed, an EPA Method 9 (40 CFR 60, Appendix A) visible emission evaluation (VEE) will be conducted. The VEE will be conducted for six minutes. If during the six minutes, any readings over 20% are noted, the observation period will be increased to one hour. If the results of the VEE exceed the opacity standard, the permittee is required to do an EPA Method 5 (40 CFR 60, Appendix A) particulate matter performance test within 90 days of the exceedance. No more than one particulate matter test is required each year, provided that the performance test results do not exceed the particulate matter emission limit.

The weekly inspections and recordkeeping required by the permit will satisfy the periodic monitoring requirements for the incinerator.

PL1-MAINT

Lear will be required to perform daily inspections of the maintenance spray booth filter(s) each day the spray booth is in operation. The daily inspections will reveal potential problems with the filter(s), thereby allowing the problems to be identified prior to operation of the maintenance spray booth. If the filter(s) are not functioning properly, visible emissions will be present.

The VOC limit was set at the maximum rated capacity of the maintenance spray booth utilizing the worst case coating. Therefore, if the spray booth is operated at capacity, or below, there should not be a violation of the VOC emission limit.

Lear will calculate VOC emissions from PL1-MAINT as follows:

$$E = \sum_{i=1}^{n} C_i G_i$$

.... Equation 3

Where:

E	=	VOC emission rate of the maintenance spray booth [Unit PL1-MAINT] (lb/time period)
C_i	=	VOC content of each material [including coatings, thinners, and cleaning solvents] (i) applied in the maintenance spray booth [Unit PL1-MAINT] during the time period (lb/gal)
G_i	=	number of gallons of each material [including coatings, thinners, and cleaning solvents] (i) applied in the maintenance spray booth [Unit PL1-MAINT] during each month (gal)

Annual emissions shall be calculated as the sum of each consecutive 12 month period.

The daily inspections and recordkeeping required by the permit satisfy the periodic monitoring requirement for the maintenance spray booth.

PL1-PBP90

Lear will be required to perform daily inspections of the paint spray booth filter(s) each day the paint spray booth is in operation. The daily inspections will reveal potential problems with the filter(s), thereby allowing the problems to be identified prior to operation of the paint spray booth. If the filter(s) are not functioning properly, visible emissions will be present.

Lear is required to maintain certified MSDS showing VOC content for each coating used in the spray booth. The MSDS sheets that Lear obtains from their vendor includes the VOC content, derived by Method 24 for solvent based coatings and calculated for water based coatings. It should be noted that their vendor believes Method 24 to provide inconsistent results when testing water borne coatings and that EPA is currently in the process of revising Method 24 as it applies to water borne coatings. Therefore, the vendor has opted to certify to the VOC content based on material balance-type methods. These MSDS will be utilized in calculating VOC emissions as detailed below.

Lear will demonstrate compliance with the VOC emission limits using the VOC content in the certified MSDS in mass balance calculations. The VOC content has been certified by the vendor, thereby providing reasonable assurance that the VOC emission limits are not violated.

Lear will determine compliance with the VOC emission limits for the paint spray booths using the following formulas:

- To determine average VOC content:

$$AC = \frac{\sum_{i=1}^{n} C_i G_i}{\sum_{i=1}^{n} G_i}$$

.... Equation 4

Where:

AC	=	average VOC content of materials [including coatings, thinners, and cleaning solvents] for the paint spray booth [Unit PL1-PBP90] (lb/gal)
C_i	=	VOC content of each material [including coatings, thinners, and cleaning solvents] (i) applied in the paint spray booth [Unit PL1-PBP90] during each month (lb/gal)
G_i	=	number of gallons of each material [including coatings, thinners, and cleaning solvents] (i) applied in the paint spray booth [Unit PL1-PBP90] during each month (gal)

Average VOC content shall be calculated once each calendar month.

- To determine annual emissions of VOC from coating usage:

$$E = \sum_{i=1}^{n} C_i G_i$$

.... Equation 5

Where:

E	=	VOC emission rate of the paint spray booth [Unit PL1-PBP90] (lb/time period)
C_i	=	VOC content of each material [including coatings, thinners, and cleaning solvents] (i) applied in the paint spray booth [Unit PL1-PBP90] during the time period (lb/gal)
G_i	=	number of gallons of each material [including coatings, thinners, and cleaning solvents] (i) applied in the paint spray booth [Unit PL1-PBP90] during each month (gal)

Annual emissions shall be calculated as the sum of each consecutive 12 month period.

The daily inspections and recordkeeping required by the permit will satisfy the periodic monitoring requirements for the paint spray booth.

Recordkeeping

The recordkeeping section incorporates requirements from Condition 4 (Part II) of the 10/28/86 minor new source review permit, Condition 11 of the 6/5/1998 minor new source review permit, and Condition 12 of the 5/3/2001 minor new source review permit.

The permit includes requirements for maintaining records of all monitoring and testing required by the permit. These records include: inspection records as required by Condition III.B.1; monthly and annual coating, thinner, and cleaning solvent throughputs to the paint spray line (Unit PL1-PAINT F); monthly and annual VOC emissions from the paint spray line (Unit PL1-PAINT F); certified MSDS sheets showing VOC content for each coating, thinner, and cleaning solvent used in the paint spray line (Unit PL1-PAINT F). VOC content for solvent based materials shall be established using EPA Method 24 or 24A. VOC content for water based materials shall be established using mass balance calculations or DEQ approved equivalent; monthly calculations showing the average hourly VOC emissions from the paint spray line (Unit PL1-PAINT F); hours of operation of the paint spray line (Unit PL1-PAINT F) on a monthly basis; annual throughput of material to the incinerator (Unit INC-1); annual throughput of #2 fuel oil and propane to the incinerator (Unit INC-1); a log of weekly inspections and the results of all VEE performed on the incinerator stack (Stack 1-8) as required in Condition III.B.5; monthly and annual coating, thinner, and cleaning solvent throughputs to the maintenance spray booth (Unit PL1-MAINT); monthly and annual VOC emissions from the maintenance spray booth (Unit PL1-MAINT); certified MSDS sheets showing VOC content for each coating, thinner, and cleaning solvent used in the maintenance spray booth (Unit PL1-MAINT). VOC content for solvent based materials shall be established using EPA Method 24 or 24A. VOC content for water based materials shall be established using mass balance calculations or DEQ approved equivalent; total monthly and annual throughput of all coatings used in the paint spray booth (Unit PL1-PBP90); total monthly and annual paint thinner and cleaner throughputs used in the

paint spray booth (Unit PL1-PBP90); monthly weighted average VOC content of all coatings, all thinners, and all cleaners (in pounds per gallon less water and exempt solvent) used in the paint spray booth (Unit PL1-PBP90) based on the highest VOC content of all coatings, all thinners, and all cleaners; monthly and annual VOC emissions from the paint spray booth (Unit PL1-PBP90) based on the highest VOC content of all coatings, all thinners, and all cleaners used in the paint spray booth; certified MSDS sheets or other vendor information showing VOC content, toxic compound content, water content, and solids content for each coating, thinner, and cleaner used in the paint spray booth (Unit PL1-PBP90). VOC content for solvent based materials shall be established using EPA Method 24 or 24A. VOC content for water based materials shall be established using mass balance calculations or DEQ approved equivalent; monthly calculations showing the average VOC content of coating used in the paint spray booth (Unit PL1-PBP90); records as required by Condition III.A.18; records as required by Condition III.A.19. Records as required by Condition III.A.20.

Testing

The permit does not require source tests. A table of test methods has been included in the permit if testing is performed. The Department and EPA have authority to require testing not included in this permit if necessary to determine compliance with an emission limit or standard.

Reporting

The permittee is required to submit semiannual reports regarding the paint spray booths (Unit PL1-PAINT F). Each report is to include:

- Monthly and rolling 12 month emissions of VOC (in tons) from the paint spray booths (Unit PL1-PAINT F).

- Average hourly VOC emissions from the paint spray booths (Unit PL1-PAINT F) for each month of operation during the semiannual period.

- Coatings utilized, including VOC content of each, in the paint spray booths (Unit PL1-PAINT F) during the semi-annual period.

This requirement was included as Condition 6 (Part I) in the minor new source review permit dated October 20, 1986, and has been incorporated into the Title V operating permit. It should be noted that the language has been amended to more clearly state what was required in the report.

Streamlined Requirements

PL1-PAINT F

Conditions 7 and 8 (Part I) and 1 and 2 (Part II) of the October 20, 1986 have not been included in the Title V permit. The requirements have been fulfilled, and are therefore no longer applicable.

INC-1

Conditions 2 and 3 of the May 13, 1977 permit have not been included in the Title V permit. The requirements have been fulfilled, and are therefore no longer applicable.

PL1-MAINT

The maintenance spray booth (Unit PL1-MAINT) was constructed after 1972, and is subject to 9 VAC 5-50-80, Standard for Visible Emissions. The standard limits visible emissions to 20% except during one six minute period in any one hour in which visible emissions shall not exceed 30%.

The minor new source review permit (6/5/98) limits visible emissions from the maintenance spray booth to 5%.

Compliance with the opacity limit from the minor new source review permit will ensure compliance with 9 VAC 5-50-80. 9 VAC 5-50-80 has been streamlined, and the Title V operating permit simply contains the opacity limitation from the minor new source review permit.

Condition 10 of the minor new source review permit (6/5/98) has not been included in the Title V permit. The required notifications have been submitted, and the condition is no longer an applicable requirement.

PL1-PBP90

The paint spray booth (Unit PL1-PBP90) was constructed after 1972, and is subject to 9 VAC 5-50-80, Standard for Visible Emissions. The standard limits visible emissions to 20% except during one six minute period in any one hour in which visible emissions shall not exceed 30%.

The minor new source review permit (5/3/2001) limits visible emissions from the paint spray booth to 5%.

Compliance with the opacity limit from the minor new source review permit will ensure compliance with 9 VAC 5-50-80. 9 VAC 5-50-80 has been streamlined, and the Title V operating permit simply contains the opacity limitation from the minor new source review permit.

Plant 2 Requirements

Limitations

PL2-PAINT [paint line]

The paint line is subject to 9 VAC 5-50-80, Standard for Visible Emissions, which requires visible emissions to be less than 20% except during one six minute period in any one hour in which visible emissions can not exceed 30%.

A requirement to operate filters or a water curtain on the paint line has been included to ensure compliance with the visible emission standard.

HCO [heat cleaning oven]

The following limitations are state BACT requirements from the minor new source review permit issued on February 19, 1998. Please note that the condition numbers are from the 1998 permit; a copy of the permit is enclosed as Attachment F.

Condition 3: Requires operation of an afterburner with a minimum operating temperature of 1600°F.

Condition 4: Approved fuel for the afterburner is natural gas.

Condition 7: Limits PM and PM-10 emissions to 0.02 gr/dscf.

Condition 8: Limits visible emissions from the heat cleaning oven to 5% opacity.

Condition 14: Requires a maintenance schedule be maintained for the process and air pollution control equipment. Requires spare parts be maintained on site.

Condition 15: Requires that written operating procedures be maintained for air pollution control equipment.

PL2-GB1-LINE 1, PL2-GB2-LINE 1, PL2-GB1-LINE 2, PL2-GB2-LINE 2 [glue application lines]

The following limitations are state BACT requirements from the minor new source review permit issued on June 5, 1998. Please note that the condition numbers are from the 1998 permit;

a copy of the permit is enclosed as Attachment D.

Condition 4: Requires particulate emissions from the glue application spray booths be controlled by dry filters.

Condition 5: Requires use of HVLP guns and limits coating VOC content to 0.4 lb/gal.

Condition 6: Limits glue usage to 176,600 gallons per year.

Condition 7: Emission limits for PM, PM-10, and VOC.

Condition 9: Limits visible emissions to 5% opacity.

Condition 15: Requires a maintenance schedule be maintained for the process and air pollution control equipment. Requires spare parts be maintained on site.

Monitoring

PL2-PAINT

Lear will be required to perform daily inspections of the paint line filter(s) each day the paint line is in operation. The daily inspections will reveal potential problems with the filter(s), thereby allowing the problems to be identified prior to operation of the paint line. If the filter(s) are not functioning properly, visible emissions will be present.

The daily inspections and recordkeeping required by the permit satisfy the periodic monitoring requirement for the paint line.

Lear will calculate VOC emissions from PL2-PAINT as follows:

$$E = \sum_{i=1}^{n} C_i G_i$$

.... Equation 6

Where:

E	=	VOC emission rate of the paint line [Unit PL2-PAINT] (lb/time period)
C_i	=	VOC content of each material [including coatings, thinners, and cleaning solvents] (i) applied in the paint line [Unit PL2-PAINT] during the time period (lb/gal)
G_i	=	number of gallons of each material [including coatings, thinners, and cleaning solvents] (i) applied in the paint line [Unit PL2-PAINT] during

each month (gal)

Annual emissions shall be calculated as the sum of each consecutive 12 month period.

HCO

Opacity has been chosen as a surrogate for PM and PM-10 emissions. The permittee will perform weekly inspections of the heat cleaning oven stack to determine the presence of visible emissions. If during the inspection visible emissions are observed, timely corrective action must be taken to return the oven to operating without visible emissions. If twelve consecutive weekly inspections show no visible emissions, then the frequency of inspections can be reduced to monthly. However, as soon as one monthly inspection shows visible emissions the frequency of inspections is increased to weekly until 12 consecutive inspections show no visible emissions.

The weekly inspections and recordkeeping required by the permit will satisfy the periodic monitoring requirements for the incinerator.

PL2-GB1-LINE 1, PL2-GB2-LINE 1, PL2-GB1-LINE 2, PL2-GB2-LINE 2

Lear will be required to perform daily inspections of the glue application filter(s) each day the glue application booth(s) are in operation. The daily inspections will reveal potential problems with the filter(s), thereby allowing the problems to be identified prior to operation of the glue application booth(s). If the filter(s) are not functioning properly, visible emissions will be present.

Lear is required to maintain certified MSDS showing VOC content for each coating used in glue application. The MSDS sheets that Lear obtains from their vendor includes the VOC content, derived by Method 24 for solvent based coatings and calculated for water based coatings. It should be noted that their vendor believes Method 24 to provide inconsistent results when testing water borne coatings and that EPA is currently in the process of revising Method 24 as it applies to water borne coatings. Therefore, the vendor has opted to certify to the VOC content based on material balance-type methods. These MSDS will be utilized in calculating VOC emissions as detailed below.

Lear will demonstrate compliance with the VOC emission limits using the VOC content in the certified MSDS in mass balance calculations. The VOC content has been certified by the vendor, thereby providing reasonable assurance that the VOC emission limits are not violated.

Lear will determine compliance with the VOC emission limits for glue application using the following formulas:

- To determine average VOC content:

$$AC = \frac{\sum_{i=1}^{n} C_i G_i}{\sum_{i=1}^{n} G_i}$$

.... Equation 7

Where:

AC = average VOC content of glue coatings applied in the four glue application spray booths [Units PL2-GB1-Line 1, PL2-GB2-Line 1, PL2-GB1-Line 2, and PL2-GB2-Line 2] (lb/gal)

C_i = VOC content of each coating (i) applied in the four glue application spray booths [Units PL2-GB1-Line 1, PL2-GB2-Line 1, PL2-GB1-Line 2, and PL2-GB2-Line 2] during each month (lb/gal)

G_i = number of gallons of each coating (i) applied in the four glue application spray booths [Units PL2-GB1-Line 1, PL2-GB2-Line 1, PL2-GB1-Line 2, and PL2-GB2-Line 2] during each month (gal)

Average VOC content shall be calculated once each calendar month.

- To determine VOC emission rates:

$$E = \sum_{i=1}^{n} C_i G_i$$

.... Equation 8

Where:

E = VOC emission rate from the four glue application spray booths [Units PL2-GB1-Line 1, PL2-GB2-Line 1, PL2-GB1-Line 2, and PL2-GB2-Line 2](lb/time period)

C_i = VOC content of each coating (i) applied in the four glue application spray booths [Units PL2-GB1-Line 1, PL2-GB2-Line 1, PL2-GB1-Line 2, and PL2-GB2-Line 2]during the time period (lb/gal)

G_i = number of gallons of each coating (i) applied in the four glue application spray booths [Units PL2-GB1-Line 1, PL2-GB2-Line 1, PL2-GB1-Line 2, and PL2-GB2-Line 2]during each month (gal)

Annual emissions shall be calculated as the sum of each consecutive 12 month period.

Lear will determine compliance with the particulate emission limits for glue application using the following formulas:

- To calculate particulate emissions on a monthly or annual basis:

$$E = \left(\sum_{i=1}^{n} P_i G_i D_i \right) \left(\frac{100 - T}{100} \right) \left(\frac{100 - CE}{100} \right)$$

.... Equation 9

Where:

E = particulate emission rate for the four glue application spray booths [Units PL2-GB1-Line 1, PL2-GB2-Line 1, PL2-GB1-Line 2, and PL2-GB2-Line 2] (lb/time period)

P_i = solids content of each coating (i) applied in the four glue application spray booths [Units PL2-GB1-Line 1, PL2-GB2-Line 1, PL2-GB1-Line 2, and PL2-GB2-Line 2] during the time period (lb solids/lb paint)

G_i = number of gallons of each coating (i) applied in the four glue application spray booths [Units PL2-GB1-Line 1, PL2-GB2-Line 1, PL2-GB1-Line 2, and PL2-GB2-Line 2]during the time period (gal)

D_i = density of each coating (i) applied in the four glue application spray booths [Units PL2-GB1-Line 1, PL2-GB2-Line 1, PL2-GB1-Line 2, and PL2-GB2-Line 2]during the time period (lb/gal)

T = transfer efficiency of each glue application spray booth [Units PL2-GB1-Line 1, PL2-GB2-Line 1, PL2-GB1-Line 2, and PL2-GB2-Line 2] (%)
= 50 [unless records demonstrate a higher value is appropriate]

CE = control efficiency of the filter on each of the four glue application spray booths [Units PL2-GB1-Line 1, PL2-GB2-Line 1, PL2-GB1-Line 2, and PL2-GB2-Line 2](%)
= 85 [unless records demonstrate a higher value is appropriate]

Annual emissions shall be calculated monthly as the sum of each consecutive 12 month period.

- To calculate average daily emission rates:

$$PE = \frac{E}{H}$$

.... Equation 10

Where:

PE = average daily particulate emission rate for the four glue application spray booths [Units PL2-GB1-Line 1, PL2-GB2-Line 1, PL2-GB1-Line 2, and PL2-GB2-Line 2] (lb/day)

E = particulate emission rate for the four glue application spray booths [Units PL2-GB1-Line 1, PL2-GB2-Line 1, PL2-GB1-Line 2, and PL2-GB2-Line 2] (lb/month)

H = combined days of operation of the four glue application spray booths [Units PL2-GB1-Line 1, PL2-GB2-Line 1, PL2-GB1-Line 2, and PL2-GB2-Line 2] (days/month)

Average daily particulate emissions shall be calculated once each month.

The daily inspections and recordkeeping required by the permit will satisfy the periodic monitoring requirements for the paint spray booth.

Recordkeeping

The recordkeeping section incorporates requirements from Condition 11 of the 6/5/1998 minor new source review permit and Condition 10 of the 2/19/98 minor new source review permit.

The permit includes requirements for maintaining records of all monitoring and testing required by the permit. These records include: monthly and annual throughput of coatings, thinners, and cleaning solvents to the paint line (Unit PL2-PAINT), calculated monthly as the sum of each consecutive 12 month period; inspection records as required by Condition IV.B.1; monthly and annual VOC emissions from the paint line (Unit PL2-PAINT); certified MSDS sheets showing VOC content for each coating, thinner, and cleaning solvent used in the paint line (Unit PL2-PAINT). VOC content for solvent based materials shall be established using EPA Method 24 or 24A. VOC content for water based materials shall be established using mass balance calculations or DEQ approved equivalent; annual throughput of natural gas to the heat cleaning oven (Unit HCO), calculated monthly as the sum of each consecutive 12 month period; for each batch in the heat cleaning oven (Unit HCO), the permittee shall record the date, time, and afterburner temperature; inspection records as required by Condition IV.B.2; monthly and annual VOC emissions from glue application and curing (Units PL2-GB1-Line 1, PL2-GB2-Line 1, PL2-GB1-Line 2, and PL2-GB2-Line 2); monthly and annual glue throughput for glue application (Units PL2-GB1-Line 1, PL2-GB2-Line 1, PL2-GB1-Line 2, and PL2-GB2-Line 2); certified MSDS sheets showing coating name, solids content, and VOC content in pounds per gallon of coating for each coating used in glue application (Units PL2-GB1-Line 1, PL2-GB2-Line 1, PL2-GB1-Line 2, and PL2-GB2-Line 2). VOC content for water based coatings shall be established using mass balance calculations or DEQ approved equivalent; average daily, monthly, and annual particulate emissions from the four glue application spray booths (Units PL2-GB1-Line 1, PL2-GB2-Line 1, PL2-GB1-Line 2, and PL2-GB2-Line 2); days of operation

of the four glue application spray booths (Units PL2-GB1-Line 1, PL2-GB2-Line 1, PL2-GB1-Line 2, and PL2-GB2-Line 2) on a monthly basis.

Testing

The permit does not require source tests. A table of test methods has been included in the permit if testing is performed. The Department and EPA have authority to require testing not included in this permit if necessary to determine compliance with an emission limit or standard.

Condition 5 of 2/19/1998 permit and Condition 3 of 6/5/1998 permit require that test ports be provided in appropriate locations when requested. These conditions have been incorporated into the Title V permit.

Reporting

No specific reporting has been included for the units in Plant 2.

Streamlined Requirements

HCO

The heat cleaning oven was constructed after 1972, and is subject to 9 VAC 5-50-80, Standard for Visible Emissions. The standard limits visible emissions to 20% opacity except during one six-minute period in any one hour in which visible emissions shall not exceed 30% opacity.

The minor new source review permit limits visible emissions from the heat cleaning oven to 5% opacity.

Compliance with the opacity limit in the minor new source review permit will ensure compliance with 9 VAC 5-50-80. 9 VAC 5-50-80 has been streamlined, and the Title V operating permit simply contains the opacity limitation from the minor new source review permit.

Condition 6 of the minor new source review permit has not been included in the draft permit. The required testing has been completed and this is no longer an applicable requirement.

Condition 9 of the minor new source review permit has not been included in the draft permit. The required notifications have been received, and this is no longer an applicable requirement.

PL2-GB1-LINE 1, PL2-GB2-LINE 1, PL2-GB1-LINE 2, PL2-GB2-LINE 2

The glue application system was constructed after 1972, and is subject to 9 VAC 5-50-80, Standard for Visible Emissions. The standard limits visible emissions to 20% opacity except during one six-minute period in any one hour in which visible emissions shall not exceed 30% opacity.

The minor new source review permit limits visible emissions from the glue application system to 5% opacity.

Compliance with the opacity limit in the minor new source review permit will ensure compliance with 9 VAC 5-50-80. 9 VAC 5-50-80 has been streamlined, and the Title V operating permit simply contains the opacity limitation from the minor new source review permit.

Condition 10 of the minor new source review permit has not been included in the Title V permit. The required notifications have been submitted, and the condition is no longer an applicable requirement.

Plant 4 Requirements

Limitations

PL4-TCH-UP [paint booth]

The touch-up paint booth is subject to 9 VAC 5-50-80, Standard for Visible Emissions, which requires visible emissions to be less than 20% except during one six minute period in any one hour in which visible emissions can not exceed 30%.

A requirement to operate paper filters on the touch-up paint booth has been included to ensure compliance with the visible emission standard.

PL4-PAINT 1 and PL4-PAINT 2 [two paint booths]

These units were operated under a minor new source permit issued on November 3, 1992, as amended on March 21, 1995, and May 31, 1996. The two paint booths are no longer in operation at the facility and have been removed from the site. A permit amendment is currently being processed at VRO to remove the two paint booths from the minor new source permit issued on November 3, 1992, as amended on March 21, 1995, and May 31, 1996. The amended permit was issued on January 30, 2001.

Monitoring and Recordkeeping

PL4-TCH-UP

Lear will be required to perform daily inspections of the touch-up paint booth filter(s) each day the touch-up paint booth is in operation. The daily inspections will reveal potential problems with the filter(s), thereby allowing the problems to be identified prior to operation of the touch-up paint booth. If the filter(s) are not functioning properly, visible emissions will be present.

The daily inspections and recordkeeping required by the permit satisfy the periodic monitoring requirement for the touch-up paint booth.

The permit includes requirements for maintaining records of all monitoring and testing required by the permit. These records include the annual throughput of coatings to the touch-up paint booth (Unit PL4-TCH-UP) and inspection records as required by Condition VI.B.1.

Testing

The permit does not require source tests. A table of test methods has been included in the permit if testing is performed. The Department and EPA have authority to require testing not included in this permit if necessary to determine compliance with an emission limit or standard.

Reporting

No specific reporting has been included for the touch-up paint booth (Unit PL4-TCH-UP).

Streamlined Requirements

There are no streamlined requirements.

General Coating Requirements

The requirements contained within this section of the permit deal strictly with toxic compound emissions. These limits were established in the minor new source review permit so that Lear would be in compliance with 9 VAC 5 Chapter 50 Part II Article 3 (Rule 5-3: Standards of Performance for Toxic Pollutants).

Limitations

The minor new source review permit dated October 20, 1986, required that the paint booth (Unit PL1-PAINT F) be operated in compliance with Rules 4-3 and 5-3 [Condition 12 (Part II)]. This requirement has been incorporated into the Title V operating permit. A copy of the minor new source review permit is enclosed as Attachment B.

The following limitations are state BACT requirements from the minor NSR permit issued on May 3, 2001. Please note that the condition numbers are from the 2001 permit; a copy of the permit is enclosed as Attachment E.

Condition 10: Lists the approved toxic compounds that can be used in the paint spray booth (Unit PL1-PBP90). Also details conditions for using additional toxic compounds without obtaining a new permit.

The following limitations are state BACT requirements from the minor new source permit issued on January 30, 2001. Please note that the condition numbers are from the 2001 permit; a copy of the permit is enclosed as Attachment G.

Condition 4: Lists emission limits for methanol, MIBK, and toluene.

Monitoring and Recordkeeping

Recordkeeping requirements will satisfy the periodic monitoring requirements for the general coating requirements.

Lear is required to maintain MSDS or other vendor information showing VOC content, toxic compound content, water content, and solids content for each coating, thinner, and cleaner used in the paint spray booths (Unit PL1-PBP90). These MSDS will be utilized in calculating toxic emissions as detailed below.

Once each month, Lear will calculate the emission rates of all toxics emitted from the paint spray booths (Unit PL1-PBP90) as follows:

- To calculate volatile toxic compound emissions on a monthly or annual basis:

$$E_t = \sum_{i=1}^{n} C_i T_i$$

.... Equation 11

Where:

E_t = Emission rate of volatile toxic compound (t) (lb/hr)

C_i = Content of toxic compound (t) in each coating, thinner, or cleaner (i) utilized in the facility during the time period (lb/gal)

T_i = Number of gallons of each coating, thinner, or cleaner (i) utilized in the facility during the time period (gal)

Annual emissions shall be calculated monthly as the sum of each consecutive 12 month period.

- To calculate average hourly volatile toxic emission rates:

$$VE_t = \frac{E_t}{H}$$

.... Equation 12

Where:

VE_t = average hourly emission rate for volatile toxic compound (t) (lb/hour)

E_t = emission rate of volatile toxic compound (t) (lb/month)

H = number of hours of operation for the facility during the month (hr/month)

Average hourly volatile toxic compound emissions shall be calculated once each month.

- The permittee shall calculate particulate toxic compound emissions on a monthly or annual basis as follows:

$$E_t = \left(\sum_{i=1}^{n} P_i G_i D_i \right) \left(\frac{100 - T}{100} \right) \left(\frac{100 - CE}{100} \right)$$

.... Equation 13

Where:

E = Emission rate for particulate toxic compound (t) (lb/time period)

P_i = Particulate toxic compound content of each coating, thinner, or cleaner (I) applied during the time period (lb solids/lb paint)

G_i = Number of gallons of each coating, thinner, or cleaner (i) applied during the time period (gal)

D_i = Density of each coating (i) applied during the time period (lb/gal)

T = Transfer efficiency of the paint booths (%)
= 50 [unless records demonstrate a higher value is appropriate]

CE = Control efficiency of the filter (%)
= 85 [unless records demonstrate a higher value is appropriate]

Annual emissions shall be calculated monthly as the sum of each consecutive 12 month period.

The permit includes requirements for maintaining records of all monitoring and testing required by the permit. These records include: Material Safety Data Sheets (MSDS) or other

vendor information showing VOC content, toxic compound content, water content, and solids content for each coating, thinner, and cleaner utilized in the paint spray booths (Unit PL1-PBP90); monthly and annual throughput of each coating, thinner, and cleaner utilized in the paint spray booths (Unit PL1-PBP90); and, average hourly and annual emissions of each toxic listed in Condition VII.A.2.

Testing

The permit does not require source tests. A table of test methods has been included in the permit if testing is performed. The Department and EPA have authority to require testing not included in this permit if necessary to determine compliance with an emission limit or standard.

Facility Wide Requirements

Limitations

The following limitations are state BACT requirements from the minor new source permit issued on January 30, 2001. Please note that the condition numbers are from the 2001 permit; a copy of the permit is enclosed as Attachment G.

> Condition 3: Limits VOC emissions from existing facility [constructed prior to 11/3/1992 – Units PL1-PAINT F and PL2-PAINT] to 178 tons/yr.

Monitoring and Recordkeeping

Recordkeeping requirements will satisfy the periodic monitoring requirements for the general coating requirements.

The permit includes requirements for maintaining records of all monitoring and testing required by the permit. These records include: operating/monthly material usage records for the existing facility; monthly and annual VOC emission rates for the existing facility.

Testing

The permit does not require source tests. A table of test methods has been included in the permit if testing is performed. The Department and EPA have authority to require testing not included in this permit if necessary to determine compliance with an emission limit or standard.

Reporting

The permit requires semiannual and quarterly reports. The quarterly reports are to contain:

- Monthly and rolling 12 month emissions of VOC (in tons) from the existing facility.

- Monthly and rolling 12 month throughputs of VOC (in tons) from the existing facility.

While the semiannual reports are to contain:

- Status of reduced production and subsequent VOC and particulate reductions on existing paint lines [constructed prior to 11/3/1992 – Units PL1-PAINT F and PL2-PAINT] in the facility.

- Status on the continued research for suitable water-based coatings.

- Progress on the search for suitable non-VOC clean-up solvents as a part of the VOC reduction program.

These reports were required in the 1/30/01 minor new source review permit (Conditions 6 & 7) and have been incorporated into the Title V operating permit.

GENERAL CONDITIONS

The permit contains general conditions required by 40 CFR Part 70 and 9 VAC 5-80-110, that apply to all Federal operating permit sources. These include requirements for submitting semi-annual monitoring reports and an annual compliance certification report. The permit also requires notification of deviations from permit requirements or any excess emissions, including those caused by upsets, within one business day.

STATE ONLY APPLICABLE REQUIREMENTS

Lear did not identify any state-only enforceable requirements in their application, and all requirements in the state operating permit are federally enforceable. Therefore, no state-only applicable requirements have been included in the permit.

FUTURE APPLICABLE REQUIREMENTS

Lear did not identify any future applicable requirements in their application. However, preliminary information regarding the Flexible Polyurethane Foam Products MACT indicates that Lear will most likely be subject to the MACT requirements. At this time, the MACT has not been promulgated. Therefore, no future applicable requirements have been included in the permit.

INAPPLICABLE REQUIREMENTS

Lear listed several requirements that they believed to be inapplicable requirements. The requirements have actually been streamlined, and are addressed in other sections of this document. Therefore, there are no inapplicable requirements listed in the Title V operating permit.

COMPLIANCE PLAN

Lear is currently in compliance with all applicable requirements. No compliance plan was included in the application or in the permit.

INSIGNIFICANT EMISSION UNITS

The insignificant emission units are presumed to be in compliance with all requirements of the Clean Air Act as may apply. Based on this presumption, no monitoring, recordkeeping or reporting shall be required for these emission units in accordance with 9 VAC 5-80-110.

Insignificant emission units include the following:

Table IV. Insignificant Emission Units.

Emission Unit No.	Emission Unit Description	Citation	Pollutant(s) Emitted (9 VAC 5-80-720 B)	Rated Capacity (9 VAC 5-80-720 C)
PL1F-OV	Drying oven for front paint line in Plant 1	9 VAC 5-80-720 C	-	0.16 mmBTU/hr
PL2-OV	Drying oven for paint operating in Plant 2	9 VAC 5-80-720 C	-	0.5 mmBTU/hr
PL2-OV1-6	Six curing ovens for rotocast operation	9 VAC 5-80-720 C	-	1.5 mmBTU/hr (each)
SH1-40	Forty space heaters in Plant 1	9 VAC 5-80-720 C	-	0.26 mmBTU/hr (each)
SH41-57	Seventeen space heaters in Plant 2	9 VAC 5-80-720 C	-	0.26 mmBTU/hr (each)
SH58-73	Sixteen space heaters in Plant 3	9 VAC 5-80-720 C	-	0.26 mmBTU/hr (each)
SH74-76	Three space heaters in Plant 4	9 VAC 5-80-720 C	-	2.817 mmBTU/hr (each)
SH77-78	Two space heaters in Plant 4	9 VAC 5-80-720 C	-	1.15 mmBTU/hr (each)
PH-1	Process heater in Plant 3	9 VAC 5-80-720 C	-	0.167 mmBTU/hr (each)
PL2-OV-GLUE1	Infrared Drying/Curing Oven	9 VAC 5-80-720 C	-	0.504 mmBTU/hr

Emission Unit No.	Emission Unit Description	Citation	Pollutant(s) Emitted (9 VAC 5-80-720 B)	Rated Capacity (9 VAC 5-80-720 C)
PL2-OV-GLUE2	Infrared Drying/Curing Oven	9 VAC 5-80-720 C	-	0.504 mmBTU/hr
PL2-FOAM A	Conveyorized foam production line (Plant 2)	9 VAC 5-80-720 B	VOC HAPs	-
PL2-FOAM B	Carousel foam production station (Plant 2)	9 VAC 5-80-720 B	VOC HAPs	-
PL3-DN101B	Carousel foam production station using foam (Plant 3)	9 VAC 5-80-720 B	VOC HAPs	-
PL3-FOAM 9B	Carousel foam production station using foam (Plant 3)	9 VAC 5-80-720 B	VOC HAPs	-
PL3-FOAM 13B	Carousel foam production station using foam (Plant 3)	9 VAC 5-80-720 B	VOC HAPs	-
PL3-FOAM 1A	Conveyorized foam production using foam (Plant 3)	9 VAC 5-80-720 B	VOC HAPs	-
PL3-FOAM 2A	Conveyorized foam production using white foam (Plant 3)	9 VAC 5-80-720 B	VOC HAPs	-
PL3-FOAM 3A	Conveyorized foam production using foam (Plant 3)	9 VAC 5-80-720 B	VOC HAPs	-
PL3-FOAM 8A	Conveyorized foam production using foam (Plant 3)	9 VAC 5-80-720 B	VOC HAPs	-
PL3-FOAM 4A	Conveyorized foam production using foam (Plant 3)	9 VAC 5-80-720 B	VOC HAPs	-
PL3-FOAM 6A	Conveyorized foam production using foam (Plant 3)	9 VAC 5-80-720 B	VOC HAPs	-
PL3-FOAM 10A	Conveyorized foam production using foam (Plant 3)	9 VAC 5-80-720 B	VOC HAPs	-
PL3-FOAM 11A	Conveyorized foam production using foam (Plant 3)	9 VAC 5-80-720 B	VOC HAPs	-
PL1-RESIN 1	Injection Molding Machine (Plant 1)	9 VAC 5-80-720 B	VOC HAPs	-
PL1-RESIN 2	Injection Molding Machine (Plant 1)	9 VAC 5-80-720 B	VOC HAPs	-

Emission Unit No.	Emission Unit Description	Citation	Pollutant(s) Emitted (9 VAC 5-80-720 B)	Rated Capacity (9 VAC 5-80-720 C)
PL1-RESIN 3	Injection Molding Machine (Plant 1)	9 VAC 5-80-720 B	VOC HAPs	-
PL1-RESIN 4	Injection Molding Machine (Plant 1)	9 VAC 5-80-720 B	VOC HAPs	-
PL1-RESIN 5	Injection Molding Machine (Plant 1)	9 VAC 5-80-720 B	VOC HAPs	-
PL1-RESIN 6	Injection Molding Machine (Plant 1)	9 VAC 5-80-720 B	VOC HAPs	-
PL1-RESIN 7	Injection Molding Machine (Plant 1)	9 VAC 5-80-720 B	VOC HAPs	-
PL1-RESIN 8	Injection Molding Machine (Plant 1)	9 VAC 5-80-720 B	VOC HAPs	-
PL1-RESIN 9	Injection Molding Machine (Plant 1)	9 VAC 5-80-720 B	VOC HAPs	-
PL1-RESIN 10	Injection Molding Machine (Plant 1)	9 VAC 5-80-720 B	VOC HAPs	-
PL1-RESIN 14	Injection Molding Machine (Plant 1)	9 VAC 5-80-720 B	VOC HAPs	-
PL1-RESIN 14A	Injection Molding Machine (Plant 1)	9 VAC 5-80-720 B	VOC HAPs	-
PL1-RESIN 19	Injection Molding Machine (Plant 1)	9 VAC 5-80-720 B	VOC HAPs	-
PL1-RESIN 20	Injection Molding Machine (Plant 1)	9 VAC 5-80-720 B	VOC HAPs	-
PL1-RESIN 21	Injection Molding Machine (Plant 1)	9 VAC 5-80-720 B	VOC HAPs	-
PL1-RESIN 22	Injection Molding Machine (Plant 1)	9 VAC 5-80-720 B	VOC HAPs	-
PL1-RESIN 23	Injection Molding Machine (Plant 1)	9 VAC 5-80-720 B	VOC HAPs	-
PL1-RESIN 24	Injection Molding Machine (Plant 1)	9 VAC 5-80-720 B	VOC HAPs	-
PL1-RESIN 25	Injection Molding Machine (Plant 1)	9 VAC 5-80-720 B	VOC HAPs	-
PL1-RESIN 26	Injection Molding Machine (Plant 1)	9 VAC 5-80-720 B	VOC HAPs	-
PL1-RESIN 27	Injection Molding Machine (Plant 1)	9 VAC 5-80-720 B	VOC HAPs	-
PL1-RESIN 30	Injection Molding Machine (Plant 1)	9 VAC 5-80-720 B	VOC HAPs	-
PL1-RESIN 31	Injection Molding Machine (Plant 1)	9 VAC 5-80-720 B	VOC HAPs	-
PL1-RESIN 32	Injection Molding Machine (Plant 1)	9 VAC 5-80-720 B	VOC HAPs	-

Emission Unit No.	Emission Unit Description	Citation	Pollutant(s) Emitted (9 VAC 5-80-720 B)	Rated Capacity (9 VAC 5-80-720 C)
PL1-RESIN 33	Injection Molding Machine (Plant 1)	9 VAC 5-80-720 B	VOC HAPs	-
PL1-RESIN 34	Injection Molding Machine (Plant 1)	9 VAC 5-80-720 B	VOC HAPs	-
PL1-RESIN 35	Injection Molding Machine (Plant 1)	9 VAC 5-80-720 B	VOC HAPs	-
PL1-RESIN 36	Injection Molding Machine (Plant 1)	9 VAC 5-80-720 B	VOC HAPs	-
PL1-RESIN 37	Injection Molding Machine (Plant 1)	9 VAC 5-80-720 B	VOC HAPs	-
PL1-RESIN 38	Injection Molding Machine (Plant 1)	9 VAC 5-80-720 B	VOC HAPs	-
PL1-RESIN 39	Injection Molding Machine (Plant 1)	9 VAC 5-80-720 B	VOC HAPs	-
PL1-RESIN 40	Injection Molding Machine (Plant 1)	9 VAC 5-80-720 B	VOC HAPs	-
PL1-RESIN 41	Injection Molding Machine (Plant 1)	9 VAC 5-80-720 B	VOC HAPs	-
PL1-RESIN 42	Injection Molding Machine (Plant 1)	9 VAC 5-80-720 B	VOC HAPs	-
PL1-RESIN 43	Injection Molding Machine (Plant 1)	9 VAC 5-80-720 B	VOC HAPs	-
PL1-RESIN 44	Injection Molding Machine (Plant 1)	9 VAC 5-80-720 B	VOC HAPs	-
PL1-RESIN 45	Injection Molding Machine (Plant 1)	9 VAC 5-80-720 B	VOC HAPs	-
PL1-RESIN 46	Injection Molding Machine (Plant 1)	9 VAC 5-80-720 B	VOC HAPs	-
PL1-RESIN 47	Injection Molding Machine (Plant 1)	9 VAC 5-80-720 B	VOC HAPs	-
PL3-RESIN 11	Injection Molding Machine (Plant 3)	9 VAC 5-80-720 B	VOC HAPs	-
PL3-RESIN 12	Injection Molding Machine (Plant 3)	9 VAC 5-80-720 B	VOC HAPs	-
PL3-RESIN 13	Injection Molding Machine (Plant 3)	9 VAC 5-80-720 B	VOC HAPs	-
PL3-RESIN 15	Injection Molding Machine (Plant 3)	9 VAC 5-80-720 B	VOC HAPs	-
PL3-RESIN 16	Injection Molding Machine (Plant 3)	9 VAC 5-80-720 B	VOC HAPs	-
PL3-RESIN 17	Injection Molding Machine (Plant 3)	9 VAC 5-80-720 B	VOC HAPs	-
PL3-RESIN 18	Injection Molding Machine (Plant 3)	9 VAC 5-80-720 B	VOC HAPs	-

Emission Unit No.	Emission Unit Description	Citation	Pollutant(s) Emitted (9 VAC 5-80-720 B)	Rated Capacity (9 VAC 5-80-720 C)
PL3-RESIN 29	Injection Molding Machine (Plant 3)	9 VAC 5-80-720 B	VOC HAPs	-
PL3-RESIN 48	Injection Molding Machine (Plant 3)	9 VAC 5-80-720 B	VOC HAPs	-
PL3-RESIN 49	Injection Molding Machine (Plant 3)	9 VAC 5-80-720 B	VOC HAPs	-
PL3-RESIN 50	Injection Molding Machine (Plant 3)	9 VAC 5-80-720 B	VOC HAPs	-
PL3-RESIN 51	Injection Molding Machine (Plant 3)	9 VAC 5-80-720 B	VOC HAPs	-
PL3-RESIN 52	Injection Molding Machine (Plant 3)	9 VAC 5-80-720 B	VOC HAPs	-
PL3-RESIN 54	Injection Molding Machine (Plant 3)	9 VAC 5-80-720 B	VOC HAPs	-
PL3-RESIN 55	Injection Molding Machine (Plant 3)	9 VAC 5-80-720 B	VOC HAPs	-
PL4-RESIN 56	Injection Molding Machine (Plant 4)	9 VAC 5-80-720 B	VOC HAPs	-
PL4-RESIN 57	Injection Molding Machine (Plant 4)	9 VAC 5-80-720 B	VOC HAPs	-
PL4-RESIN 58	Injection Molding Machine (Plant 4)	9 VAC 5-80-720 B	VOC HAPs	-
PL4-RESIN 59	Injection Molding Machine (Plant 4)	9 VAC 5-80-720 B	VOC HAPs	-
PL4-RESIN 60	Injection Molding Machine (Plant 4)	9 VAC 5-80-720 B	VOC HAPs	-
PL4-RESIN 61	Injection Molding Machine (Plant 4)	9 VAC 5-80-720 B	VOC HAPs	-
PL4-RESIN 62	Injection Molding Machine (Plant 4)	9 VAC 5-80-720 B	VOC HAPs	-
PL4-RESIN 63	Injection Molding Machine (Plant 4)	9 VAC 5-80-720 B	VOC HAPs	-
PL4-RESIN 64	Injection Molding Machine (Plant 4)	9 VAC 5-80-720 B	VOC HAPs	-
PL4-RESIN 65	Injection Molding Machine (Plant 4)	9 VAC 5-80-720 B	VOC HAPs	-
PL4-RESIN 66	Injection Molding Machine (Plant 4)	9 VAC 5-80-720 B	VOC HAPs	-
PL2-VF1	Vacuum forming (Plant 2)	9 VAC 5-80-720 B	VOC	-
PL2-VF2	Vacuum forming (Plant 2)	9 VAC 5-80-720 B	VOC	-
Rotocast 1	Production of Automotive Plastic Skin Parts (Plant 2)	9 VAC 5-80-720 B	VOC	-

Emission Unit No.	Emission Unit Description	Citation	Pollutant(s) Emitted (9 VAC 5-80-720 B)	Rated Capacity (9 VAC 5-80-720 C)
Rotocast 2	Production of Automotive Plastic Skin Parts (Plant 2)	9 VAC 5-80-720 B	VOC	-
Rotocast 3	Production of Automotive Plastic Skin Parts (Plant 2)	9 VAC 5-80-720 B	VOC	-
PL3-FOAM 3B	Carousel Acoustical Foam Production (Plant 3)	9 VAC 5-80-720 B	VOC	-
PL3-FOAM 7A	Carousel Acoustical Foam Production (Plant 3)	9 VAC 5-80-720 B	VOC	-
PL2-FOAM C	Conveyorized Foam Production Line (Plant 2)	9 VAC 5-80-720 B	VOC	-

The citation criteria for insignificant activities are as follows:

9 VAC 5-80-720 A - Listed Insignificant Activity, Not Included in Permit Application
9 VAC 5-80-720 B - Insignificant due to emission levels
9 VAC 5-80-720 C - Insignificant due to size or production rate

CONFIDENTIAL INFORMATION

Lear did not submit a request for confidentiality. Therefore, all portions of the Title V application are suitable for public review.

PUBLIC PARTICIPATION

A public notice regarding the draft permit was placed in the Northern Virginia Daily, Strasburg, Virginia, on November 20, 2000. EPA was sent a copy of the draft permit and notified of the public notice on November 15, 2000. West Virginia and Maryland, the only affected states, were sent a copy of the public notice in a letter dated November 17, 2000. All persons on the Title V mailing list were also sent a copy of the public notice in letters dated November 17, 2000.

Public comments were accepted from November 20, 2000, to December 20, 2000. No comments were received from the public or the affected states regarding the draft permit. EPA sent comments in a letter dated December 18, 2000. Responses to EPA's comments can be found in a memo, dated January 29, 2000, entitled "Response to Comments."

ATTACHMENT A

1999 Emission Inventory

ATTACHMENT B

Minor NSR Permit
(dated October 20, 1986)

ATTACHMENT C

Minor NSR Permit
(dated May 13, 1977)

ATTACHMENT D

Minor NSR Permit
(dated June 5, 1998)

ATTACHMENT E

Minor NSR Permit
(dated May 3, 2001)

ATTACHMENT F

Minor NSR Permit
(dated February 19, 1998)

ATTACHMENT G

Minor NSR Permit
(dated January 30, 2001)